

1 **ALANNA D. COOPERSMITH**, SBN 248447

2 717 Washington Street

3 Oakland, CA 94607

4 Telephone: (510) 628-0596

5 Fax: (866) 365-9759

6 alanna@eastbaydefense.com

7 Attorney for Defendant,

8 **KARL FREDRIK DAVIDSON**

9
10 IN THE UNITED STATES DISTRICT COURT

11 FOR THE NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 **KARL FREDRIK DAVIDSON**,

16 Defendant.

Case No. CR 15-CR-132 EMC

**RENEWED MOTION FOR
COMPASSIONATE RELEASE**

Honorable Edward M. Chen

17 By order of October 2, 2020, the court denied Karl Davidson's motion for
18 compassionate release without prejudice on the basis that he had failed to exhaust his
19 administrative remedies. On October 7, 2020, Mr. Davidson submitted a new request for
20 compassionate release to the Warden, discussing his comorbid medical conditions as placing
21 him at heightened risk for COVID-19, as well as the health condition of his mother. On
22 October 26, 2020, the Warden of Lompoc FCI denied that request for compassionate release
23 as well.

24 As more than thirty days have elapsed since the receipt of the compassionate release
25 request by the Warden, pursuant to 18 U.S.C. § 3582(c)(1)(A), defendant Karl Davidson
26 may – and he hereby does – renew his motion for compassionate release.


27 This renewed motion for compassionate release is based upon this notice of motion,
28 and the contents of the motion for compassionate release filed on August 31, 2020 (ECF No.
CR 15-00132 EMC Interim Status Report

1 47); the declaration of Alanna Coopersmith (ECF No. 48); Karl Davidson's medical records
2 filed under seal (ECF No. 51); the memorandum in opposition of the government (ECN No.
3 52) and declaration in support thereof filed on September 18, 2020 (ECF No. 52-1); and
4 reply in support of compassionate release filed on October 1, 2020 (ECF No. 53).

5 In addition, the motion is based upon the accompanying Supplemental Declaration of
6 Counsel. Attached as Exhibit A to the Supplemental Declaration of Counsel is Mr.
7 Davidson's October 7 administrative request for compassionate release and attached as
8 Exhibit B is the October 26 denial letter. As a testament to Mr. Davidson's low risk to the
9 community, attached as Exhibit C is a document showing Mr. Davidson's clean disciplinary
10 record, and attached as Exhibit D is a report from the Bureau of Prisons finding Mr.
11 Davidson to be at minimum risk of reoffending. Also as set forth in the supplemental
12 declaration, counsel has verified Mr. Davidson's mother's medical diagnoses and confirmed
13 that the house in Martinez she owns is available for Mr. Davidson to live in.

14 Dated: November 30, 2020

Respectfully Submitted,

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17 Alanna D. Coopersmith
18 Attorney for Defendant,
19 Karl Fredrik Davidson
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